



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Libby 005  
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Ref: 8EPR-SR

The Honorable Jon Tester  
United States Senate  
Washington, DC 20510

Dear Senator Tester:

Thank you for your letter of July 13, 2011, regarding recent press reports of asbestos in the wood chip piles located at the former Stimson Lumber Mill property in Libby, Montana. I appreciate the opportunity to clarify the concerns raised in your letter regarding EPA's activities to protect the citizens of Libby.

As you know, this Administration has taken the unprecedented step in declaring a public health emergency in Libby, MT under law and has invested almost \$400 million dollars to cleanup up the town thus far. The EPA will not walk away from the people of Libby. We are here for the duration to deal with issues, large and small, in a transparent, science based and open manner. The EPA will honor its commitment to the people of Libby.

I hope that the following information is helpful in addressing the questions you raised in your letter:

1. Why was the community not immediately informed about the potential risks? If your agency didn't determine a result of four in 20 samples showing toxicity, what results would you have needed to determine it indeed was a risk?

Response: The EPA collected and analyzed 20 bulk samples from the wood chip piles at the Stimson Lumber Mill property in October 2007 to determine the presence or absence of asbestos. Asbestos was detected in 4 of the 20 samples analyzed. Contemporaneously with the bulk samples, EPA also conducted activity based sampling (ABS), which was designed to evaluate potential exposures to workers and equipment operators on and near the wood chip piles. The ABS results indicated that no asbestos exposure was measured in personal air samples, thus no risk was identified for these activities. The EPA published the bulk sample and ABS data in "The Libby Asbestos Site OU5 Final Sampling Summary Report 2007 Investigations", dated July 25, 2008. The EPA made this report available at the Libby Information Center in August 2008.

It is important to note that, for Libby amphibole asbestos (LA), determination of the concentration in a bulk material (e.g., soil, sand, gravel, wood chips, etc.) provides only a relative potential to present a risk to human health, not a quantitative representation of

that risk. Activity based sampling is the EPA's preferred methodology to quantitatively evaluate exposures to asbestos including LA. It is through the use of these air concentrations in the breathing zone of the individuals potentially exposed that EPA can determine whether a particular material, such as wood chips, actually presents a risk when used or handled in customary ways. Although the ABS results for the workers and equipment operators at the former Stimson Lumber Mill property indicated no exposures, the EPA will be conducting additional ABS on the wood chips this summer to further evaluate the potential for exposures to occur from this material.

2. What changed between the testing in 2007 and March 25, 2011, when the EPA cautioned on transporting or selling this material? Why was this restriction not in place earlier?

Response: The primary change from 2007 was the emerging picture of non-cancer risk (pleural abnormalities, in particular) as the limiting factor in determining acceptable risk based air concentrations. Because our new work on the toxicity of Libby amphibole asbestos indicates a much lower concentration of fibers in the air may pose a risk, the Agency is re-evaluating a number of potential exposure pathways. Whereas the ABS detected no asbestos in the personal air monitoring of workers and equipment operators at the former Stimson Lumber Mill property, and workers are expected to have greater contact time with larger quantities of wood chips than individual homeowners, the EPA, nonetheless, took the precautionary measure of recommending to the Kootenai River Development Council (KRDC) in a March 25, 2011, letter and in subsequent conversations, that the wood chip material not be sold until we have more information. Our understanding is that KRDC accepted this recommendation. If the EPA finds with additional sampling and analysis that the wood chips pose an unacceptable risk or may pose an imminent and substantial endangerment to public health or the environment, the Agency would have a basis under CERCLA to stop KRDC from selling and distributing the material from the site.

3. How much of this mulch was shipped out of the Libby area? The region? What are the plans for monitoring and controlling this mulch?

Response: The EPA is not certain of the amount of wood chips removed from the former Stimson Lumber Mill property. If the EPA finds with additional sampling and analysis that the wood chips pose an unacceptable risk or may pose an imminent and substantial endangerment to public health or the environment, the Agency will evaluate alternatives for managing the wood chip materials within the Libby Asbestos Superfund Site.

4. How many homes in Libby currently use this mulch? Will these properties need to be re-cleaned? If so, how many yards will you need to re-clean because of the uses of this mulch? What will be the increased cost of these additional re-cleanings?

Response: The EPA is not certain of the number of homes that have used wood chips from the former Stimson Lumber Mill property after a cleanup has been conducted on their property. If the EPA finds with additional sampling and analysis that the wood


chips pose an unacceptable risk or may pose an imminent and substantial endangerment to public health or the environment, the Agency will evaluate alternatives for managing the wood chip materials within the Libby Asbestos Superfund Site. In the meantime, if a property owner is concerned they may call Environmental Resource Specialist (ERS) at 406-291-5335, and a representative will evaluate the next steps the property owner should take, if any.

5. You have indicated there will be further testing of the mulch. Where in the process is your planned additional sampling? Will that include Activity Based Sampling? Will it include special considerations for this material after being moved?

Response: This summer, the EPA will conduct additional ABS studies at a controlled location to evaluate homeowner exposure to the wood chips. While the sampling plan for the wood chips has not yet been finalized, it will include evaluating exposures to asbestos while conducting residential activities that disturb the wood chips. We expect to have final quality assured information next spring which will help inform us of next steps if any on the wood chips.

We appreciate your continued interest in the EPA's clean-up actions in Libby. If you or your staff would like additional information, please contact me or Sandy Fells, Regional Congressional Liaison, at 303-312-6604 or [fells.sandy@epa.gov](mailto:fells.sandy@epa.gov).

Sincerely,

  
James B. Martin  
Regional Administrator